FOR THE EASTERN DISTRICT OF PENNSYLVANIA

	JOHN M. N	OLAN, JR. : CIVIL ACTION	
	894 Marker	Drive :	
		West Chester, Pennsylvania 19382-550'	7:
:			
		Plaintiff,:	
		:	
		v.: NO. 02-2805	
:			
	READING 1	BLUE MOUNTAIN &:	
			NORTHER
			RAILROAD COMPANY :
a Pennsylvania Corporation, :			•
	One Railroa	d Boulevard :	
	Port Clinton	a, Pennsylvania 19549 :	
		:	
		Defendant.: TRIAL BY JURY DEMA	NDED

Case 2:02-cv-02805-PBT Document 2 Filed 09/06/2002 Page 2 of 3 REQUEST FOR ENTRY OF DEFAULT JUDGMENT

PURSUANT TO RULE 55(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE

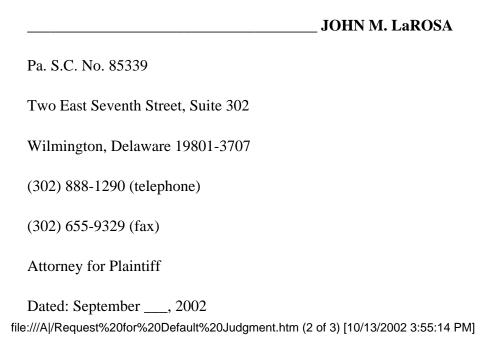
Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff John M. Nolan, Jr. hereby Requests Entry of Default Judgment against Defendant Reading Blue Mountain & Northern Railroad Company. In support of this Request, Plaintiff alleges the following:

1.	Defendant Reading Blue Mountain & Northern Railroad Company was properly
	served with a Verified Complaint on Friday, August 16, 2002.

- 2. The time for Defendant to file an Answer to the Verified Complaint has expired.
- 3. As of the date of the filing of this Request for Entry of Default Judgment,

Defendant has not filed an Answer, Motion to Dismiss, Motion for Summary Judgment, or other defense.

WHEREFORE, Plaintiff John M. Nolan, Jr. Requests Entry of Default Judgment against Defendant Reading Blue Mountain & Northern Railroad Company for want of Answer or other defense.



CERTIFICATE OF SERVICE

I, John M. LaRosa, being a member of the Bar of this Court, do hereby certify that on September ____, 2002, I caused two (2) copies of the foregoing **REQUEST FOR ENTRY OF DEFAULT JUDGMENT PURSUANT TO RULE 55(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE** to be sent via first class U.S. mail, postage prepaid to the following:

Andrew M. Muller, Jr.

Chief Executive Officer and Chairman

Reading Blue Mountain & Northern Railroad Company

One Railroad Boulevard

Port Clinton, Pennsylvania 19549

_______JOHN M. LaROSA

cc: John M. Nolan, Jr.

Attorney Files/John's Files/Client Files/Nolan/Pleadings/Request for Default Judgment